

ESTTA Tracking number: **ESTTA257660**

Filing date: **12/29/2008**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91186795
Party	Plaintiff Angels Baseball LP
Correspondence Address	Jane Shih Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES jss@cjl.com, trademark@cjl.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Jane Shih
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Date	12/29/2008
Attachments	ANGL.pdf ( 3 pages )(8405 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

	x	
ANGELS BASEBALL LP,	:	
Opposer,	:	Opposition No. 91186795
v.	:	
ANGL, INC.	:	
Applicant.	:	
	x	

**MOTION ON CONSENT TO CONTINUE SUSPENSION  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the above-captioned proceeding for a period of two (2) months, until **March 6, 2009**. Applicant's counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

Since the last continuance, progress has been made toward settlement of this matter. The parties have agreed to the terms of a settlement agreement and the additional time is requested to allow the parties to exchange execution copies of the settlement agreement, which would resolve this matter without the need to proceed with the opposition.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six (6) months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial and other periods should be reset accordingly.

Dated: New York, New York  
December 29, 2008

Respectfully submitted,  
COWAN, LIEBOWITZ & LATMAN, P.C.  
Attorneys for Opposer

By                     /Jane Shih/                      
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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of the foregoing Motion on Consent to be sent via first class, postage paid mail to Applicant's attorney, Melvin L. Chung, Esq., Lee & Chung Attorneys at Law, 5042 Wilshire Blvd., #356, Los Angeles, CA 90036-4305 on December 29, 2008.

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/Jane Shih/  
Jane Shih